

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<hr/>	:	CHAPTER 7
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CHONG WOO YI	:	BANKRUPTCY NO. 19-14866(MDC)
	:	
Debtor	:	
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**APPLICATION OF CHRISTINE C. SHUBERT, CHAPTER 7
TRUSTEE, TO EMPLOY KARALIS PC AS COUNSEL**

COMES NOW, Christine C. Shubert, Chapter 7 Trustee (the “Trustee”) for the estate (the “Estate”) of Chong Woo Yi (the “Debtor”), and respectfully represents as follows:

1. On August 1, 2019, the Debtor filed for protection under Chapter 7 of the Bankruptcy Code.
2. On August 1, 2019, the Trustee was appointed and is so acting.
3. The Trustee has made a careful and diligent inquiry as to the qualifications and competence of Karalis PC (“KPC”) and is advised that KPC, by reason of ability, integrity and professional experience, is capable of providing legal counsel to the Trustee. Said KPC has no interest adverse to the Estate.
4. To the best of the Trustee’s knowledge, KPC has no connection with the Debtor, creditors or any other parties in interest, their respective attorneys or accountants pursuant to Bankruptcy Rule 2014.
5. KPC’s attorneys have represented numerous trustees in a variety of complex matters and are experienced in matters of this type.
6. The Trustee has engaged the services of Karalis PC as her counsel, subject to Court approval.
7. Karalis PC will render all professional services which are allowed to be

performed by counsel to the trustee pursuant to applicable bankruptcy law. The professional services which counsel are to render to the Trustee are as follows:

(a) Providing legal advice and preparing all legal pleadings necessary for the completion of any settlement pertaining to funds to be recovered by the Trustee;

(b) Litigating, as necessary, any and all claims asserted on behalf of the Estate;

(c) Defending, as necessary, any and all litigation asserted against the Estate and negotiating settlements of these claims upon discussion with the Trustee on behalf of the Estate; and

(d) Advising the Trustee on all legal matters which might arise during the pendency of this proceeding.

8. Specifically, Karalis PC will provide legal services to the Trustee concerning the following:

- a. All legal duties related to the possible sale of real property and
- b. All legal duties related to the administration of all other assets.

9. The hourly rates presently charged by the firm are as follows: Shareholders/Directors rates are \$530.00 per hour and Associates rates range from \$395.00 to \$445.00 per hour and Paralegal rates are \$130.00 per hour.

WHEREFORE, your Applicant prays for the employment of Karalis PC as counsel to the Trustee at such compensation as the Court allows.

**CHAPTER 7 TRUSTEE FOR THE ESTATE
OF CHONG WOO YI**

/s/ Christine C. Shubert

Christine C. Shubert

Dated: September 9, 2019